

MEMO ENDORSED

ROBINS  KAPLAN^{LLP}

2121 AVENUE OF THE STARS
SUITE 2800
LOS ANGELES, CA 90067

310 552 0130 TEL
310 229 5800 FAX
ROBINSKAPLAN.COM

February 7, 2025

VIA ECF

Hon. Victoria Reznik
United States Magistrate Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

**Re: *The Wave Studio, LLC v. General Hotel Management Ltd., et al.*,
Case No. 7-13-cv-09239-CS-VR**

Dear Judge Reznik:

Plaintiff The Wave Studio, LLC (“Wave”) writes to withdraw its December 20, 2024 request for limited discovery (ECF No. 422) and to request a further limited stay of proceedings for 45 days while Plaintiff prepares and serves an Amended Master Complaint, which would be filed on or before March 24, 2025.

Pursuant to this Court’s directive, on December 6, 2024. Plaintiff was served with three motions to dismiss filed by Defendants Booking Holdings Inc., Agoda Company Pte. Ltd., AGIP LLC, Booking.com BV, Booking.com (USA) Inc., Rocket Travel, Inc., Momondo A/S, Priceline.com LLC, Hotel Combined LLC, and Southwest Airlines Co. (“Booking Defendants’ Motion”); Defendants Trip.com Group Limited, Trip.com Travel Singapore Pte. Ltd., Skyscanner Ltd., and MakeMyTrip, Inc. (“The Trip Defendants’ Motion”); and Defendant Qatar Airlines Q.C.S.C motion to dismiss. The Booking Defendants’ Motion and the Trip Defendants’ Motion both raise statute of limitations defenses. Personal jurisdiction and extraterritoriality are also raised in the moving papers (collectively the parties on such motions are referred to herein as “MTD Defendants”)

Wave believes an amendment of the Master Complaint is appropriate to respond to the MTD Defendants. Plaintiff also agrees that to the extent one or more of the MTD Defendants maintains that the Amended Master Complaint does not cure the issues set forth in the MTD, and elects to move forward seeking dismissal on the same grounds, Plaintiff will not move to seek limited discovery, the withdrawal of such requests being set out above.

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In addition, an amendment of the Master Complaint will also serve to streamline the issues, narrow the dispute, and allow the parties to return to the original purpose of the Court's referral of this matter to Your Honor – a process for settlement. There is no prejudice to any party as a result of this brief stay, as the matter still remains stayed for all purposes, and there are no pending deadlines.

If the Court is of the view that a Motion to Amend the Master Complaint is either required or desirable, Plaintiff will prepare and file such Motion within the time frame described in this letter.

Respectfully Submitted,



Robins Kaplan LLP
Counsel for Plaintiff

Plaintiff's request for limited discovery to oppose the motions to dismiss is **DENIED** as moot, based on its withdrawal of the request. (ECF No. 433).

Plaintiff is directed to cross-move for leave to amend the master complaint, alongside continued briefing on Defendants' motions to dismiss, per the schedule below. This will avoid further delay and allow the Court to address the overlapping issues likely to be presented in the pending motions to dismiss and Plaintiff's proposed amendment of the master complaint together. The parties should continue to serve (not file) all motion papers related to the pending motions to dismiss and Plaintiff's impending cross-motion for leave to amend.

3/14/2025 - Deadline for Plaintiff's opposition to the motions to dismiss and its cross-motion for leave to amend the master complaint

4/11/2025 - Deadline for Defendants' reply papers on motions to dismiss and their opposition to the cross-motion for leave to amend

4/25/2025 - Deadline for Plaintiff's reply papers for the cross-motion for leave to amend the master complaint

Once the motions to dismiss and Plaintiff's cross-motion for leave to amend are fully briefed, the parties are directed to file all motion papers on the docket by no later than **4/28/2025**.

The Clerk of the Court is kindly directed to close the gavel associated with ECF No. 426.

SO ORDERED.


Hon. Victoria Reznik, U.S.M.J.